

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

MOM CA Investco LLC,

Debtor.

Chapter 11

Case No. 25-10321 (BLS)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the below attorneys enter their appearance, pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Local Bankruptcy Rule 2002-1, on behalf of Mohammad Honarkar and 4G Wireless, Inc. (together, “**Creditors**”). The attorneys below request, pursuant to Bankruptcy Rules 2002 and 9007, and section 342 of the United States Bankruptcy Code, that copies of all notices and pleadings given or filed in this case be given and served at the addresses, facsimile numbers, or electronic mail addresses set forth below:

Christopher A. Ward
Shanti M. Katona
Stephen A. Smith
POLSINELLI PC
222 Delaware Avenue, Suite 1101
Wilmington, DE 19801
Telephone: (302) 252-0920
Facsimile: (302) 252-0921
cward@polsinelli.com
skatona@polsinelli.com
sasmith@polsinelli.com

Elisa Hyder
POLSINELLI PC
Three Logan Square
1717 Arch Street, Suite 2800
Philadelphia, PA 19103
Telephone: (215) 267-3001
Facsimile: (215) 267-3002
ehyder@polsinelli.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery,

electronically, telephone, telegraph, telex, or otherwise filed or made with regard to the referenced case and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this notice of appearance nor any subsequent appearance, pleading, claim or suit is intended or shall be deemed to waive Creditors' (i) right to have final orders in non-core matters entered only after *de novo* review by a higher court; (ii) right to trial by jury in any proceeding so triable; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Creditors are or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: March 5, 2025
Wilmington, Delaware

POLSINELLI PC

/s/ Christopher A. Ward
Christopher A. Ward (Del. Bar No. 3877)
Shanti M. Katona (Del. Bar No. 5352)
Stephen A. Smith (Del. Bar No. 7456)
222 Delaware Avenue, Suite 1101
Wilmington, Delaware 19801
Telephone: (302) 252-0920
Facsimile: (302) 252-0921
cward@polsinelli.com
skatona@polsinelli.com
sasmith@polsinelli.com

-and-

Elisa Hyder
Three Logan Square
1717 Arch Street, Suite 2800
Philadelphia, PA 19103
Telephone: (215) 267-3001
Facsimile: (215) 267-3002
ehyder@polsinelli.com

*Counsel for Mohammad Honarkar and
4G Wireless, Inc.*